

I have been working my business for about a year now and it has been a truly rewarding experience. I have gained business knowledge and personal fulfillment running my own business which is a truly liberating blessing of our free enterprise system - the greatest in the world. I could have never had this opportunity had it not been for my MLM business model, as most other businesses can only be successfully achieved by those with wealth to begin with. I and my team put a high value on integrity in all that we do and we appreciate the government's role in monitoring business for the safety of all Americans. We understand that many unscrupulous businesses abound and therefore we are not reluctant to let our prospects fully investigate our business and product to their satisfaction before deciding that it is a good "fit" for them. We typically give them at 24 to 48 hours (at a minimum) to do their research and, of course, they decide if they are ready or need more time or more questions answered before deciding or if they are just not interested we respect their decisions. We are engaging in building business partners so we treat them with the utmost respect and integrity and teach each of our team members to do the same. We understand the FTC's mission to stop fraudulent groups from taking advantage of honest hard working Americans. However, we would hope that the FTC would balance good law with practical and fair rules that do not unnecessarily burden or encumber our ability to engage in legitimate business practices. When a business prospect has to wade through law and mentally parade past the bad companies before looking at a legitimate one, he has been unfairly biased by "broad brushing" all direct selling companies as potentially illegitimate. It should be the other way around. The government should not seek to plant an image of any company, business or business model as unscrupulous or illegal unless a specific one has violated the law. No store has warnings posted in the front window of other "like" stores that have defrauded customers. Businesses should not be biased as guilty of fraud if they are legitimate. That "image" takes business out of the hands of good, honest, legitimate business people who are living their honest American dream. The Direct Selling model of business is a legitimate business model and the government should endeavor to let it survive and thrive. When MLM's or Network Marketing or Direct Selling is cast in a negative light by the government why would anyone want to involve themselves? This is truly unfair to legitimate enterprises. The law should protect the honest business man or woman and not put a cloud of doubt in the minds of potential customers who can bring business and sales to them. That undercuts our livelihood, our good name, and all our hard work. The 7 day waiting period casts our industry in a negative light and unfairly inputs a sales delay for our business. Also, it is unfair to imply guilt with litigation reporting without distinguishing between won and lost lawsuits! And, why a requirement for references? Besides privacy issues, this is impractical and unfairly cumbersome. While we understand the earnings claim statements should be substantiated, unscrupulous people make up their own data while legitimate folks are further burdened with more detailed, legal requirements. I hope that the FTC will, in promoting good business, not undermine legitimate direct selling companies or the hard working Americans that engage in them. Thank you for considering my comments. Mrs. L. DeMercer